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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

IN RE:

ERIC RALLS,

DEBTOR.

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CASE NO. 24-60504

CHAPTER 7

**OBJECTION TO MOTION TO APPROVE AUCTION AND BID PROCEDURES
FOR THE SALE AND TRANSFER OF BUSINESS INTERESTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Bill Jaris Consulting, LLC, a party-in-interest in the above titled and numbered bankruptcy case, and files this its *Objection to Motion to Approve Auction and Bid Procedures for the Sale and Transfer of Business Interests* (“Objection” and “Motion,” respectively, and in support thereof would show the Court as follows.

1. On August 18, 2024, Eric Ralls filed a Chapter 11 bankruptcy case in this Court, and this case was converted on April 21, 2025 to one under Chapter 7 of the Bankruptcy Code.
2. Eric Ralls holds an interest in Digital Earth Media, Inc. (“DEM”), a non-Debtor entity, amounting to eighty-six percent (86%) of its stock valued in his Bankruptcy Schedules at \$11,500,000.00.
3. On October 15, 2022, DEM (the “Borrower”) executed a promissory note (“Note”) with Bill Jaris Consulting, LLC (“BJC,” or the “Lender,” as appropriate) in the original principal

amount of \$500,000.00 at eight percent (8%) annual interest and a maturity date of October 15, 2024. Pursuant to the terms of the Note, said Note is convertible into capital stock of DEM with the conversion rights defined in Schedule 1 attached to the Note. Also pursuant to the terms of the Note, the filing of bankruptcy constitutes one of the events of default that would result in all amounts owed at the date of such default becoming immediately due and payable.

4. On June 9, 2025, Areya Holder Aurzada, Chapter 7 Trustee in this case (“Trustee”), filed a *Motion to Approve Auction and Bid Procedures for the Sale and Transfer of Business Interests*. Therein, Trustee seeks to sell Ralls’s interest in 4 business interests, including DEM. Nowhere in the Trustee’s Motion does she mention BJC’s claim against DEM for amounts payable under the provisions of the Note, and further, that BJC may alternatively convert said payment into stock of DEM.

5. Given the foregoing, BJC asserts that the Trustee’s Motion should be amended to ensure that any party purchasing the assets of the Debtor, including DEM, will be made aware of BJC’s claim against DEM and that the amounts due and owing to it pursuant to the Note may be converted for stock in DEM.

WHEREFORE, PREMISES CONSIDERED, Bill Jaris Consulting, LLC prays that this Court enter an order directing the Trustee to amend her Motion to provide notice of its claim against Digital Earth Media, Inc. and its ability to convert amounts due and owing to it into stock of Digital Earth Media, Inc. in satisfaction of its debt obligations to Bill Jaris Consulting, Inc. Bill Jaris Consulting, LLC further prays that the Court will grant to it any such other and further relief to which it may show itself justly entitled.

Dated: June 26, 2025.

Respectfully submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 26, 2025, a true and correct copy of the foregoing document was served via the Court's ECF email upon all parties receiving electronic notice in this case.

/s/ Joyce W. Lindauer

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